

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

Erin Energy Corporation, *et al.*,¹

Debtors.

)
) Case No. 18-32106
)
) Chapter 11
)
) (Jointly Administered)
)

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**WITNESS AND EXHIBIT LIST OF CREDITOR ZENITH BANK FOR THE
HEARING ON JUNE 19, 2018**

[Relates to D.I. 178, 196]

Creditor Zenith Bank PLC submits the following Witness and Exhibit List for the hearing scheduled on June 19, 2018 at 9:00 a.m. (CDT), in the above-styled, jointly administered bankruptcy cases (the “Bankruptcy Cases”) before the Honorable Marvin Isgur, United States Bankruptcy Judge, 515 Rusk, Houston, Texas 77002.

WITNESS LIST

Creditor Zenith Bank PLC may call the following witnesses:

1. Any witness listed, offered, or called by any other party, including the Debtors.
2. Any witness required for rebuttal or impeachment.

EXHIBIT LIST

Trial Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
a.	DKT 38-1 BOSAH OKONYIA AFFIDAVIT [REDACTED]				
b.	DKT 38-1 PPS 16-37 TEM LOAN FACILITY AGREEMENT				
c.	DKT 38-1 DEED OF LEGAL CHARGE PPS 54-67				
d.	DKT 38-1 DEED OF ASSIGNED RIGHTS PPS 68-73				
e.	DKT 178-1 CPROPORATE GUANANTEEE CEMAC ENERGY TO ZENITH BANK				
f.	DKT 178-8 CORPORATE GUARANTEE ERIN ENERGY CORP IN FAVOR OF ZENITH BANK				
g.	DKT 178-2 LETTER FROM ZENITH BANK TO ERIN PETROLEUM LIMITED RE: RESIGNATION				
h.	DKT 178-3 TRANSACTION NOTIFICATION FROM ZENITH BANK TO RRINPETROLEUM NIGERIA				
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	Any exhibits listed, designated, or offered by any other party.				
	Any exhibits necessary for rebuttal				

¹ The last four digits of Erin Energy Corporation's federal tax identification number are 9798. The other Debtors in these cases are: Erin Energy Limited; Erin Energy Kenya Limited; and Erin Petroleum Nigeria Limited. The Debtors' service address is: 1330 Post Oak Blvd., Suite 2250, Houston, TX 77056.

Creditor Zenith Bank PLC reserves the right to modify, amend or supplement this Witness and Exhibit List at any time prior to the June 19, 2018 Hearing. Designation of any exhibit above does not waive any objections Zenith Bank PLC may have to any exhibit listed on any other party's exhibit list.

Dated: June 17, 2018

HENCHY VERBOIS & HACKENBERG

/s/ Louis Jerome Stanley, Of Counsel
7904 Wrenwood Blvd., Suite C
Baton Rouge, LA
Telephone: (225) 928-4444

Louis Jerome Stanley

Louis Jerome Stanley

*Proposed Counsel for
Zenith Bank PLC*

CERTIFICATE OF SERVICEI hereby certify that a true and correct copy of the above and foregoing has been served by electronic transmission to all registered ECF users appearing in this case.

Dated: June 17, 2018

Houston, TX

Louis Jerome Stanley

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